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October 25, 2019

By Electronic Transmission:  
Khalilah\_Williams@nysd.uscourts.gov

Khalilah Williams, Courtroom Deputy  
United States District Court  
United States Courthouse  
500 Pearl Street, Room 2510  
New York, New York 10007

**RE: Santangelo v. Santangelo, et al**  
**Docket No. 1:19-cv-08875-DAB**

Dear Ms. Williams:

We represent Plaintiff, Stephanie Santangelo. The Defendants are represented by Thomas A. Farinella, Esq. This action was commenced in the Superior Court of New Jersey, Law Division, Morris County under Docket No. MRS-L-001775-19. Plaintiff is a resident of the State of New York. All of the Defendants are residents of the State of New Jersey. The events which gave rise to the Complaint occurred in the State of New Jersey.

Attorney Farinella filed an Amended Notice of Removal in this matter on September 26, 2019.

Plaintiff desires to file a motion to transfer venue of this action to the United States District Court for the District of New Jersey. The Defendant, Adrian Brown, has represented to the Family Court of the State of New York, County of New York in a pending matter that she will not appear before that court in New York citing health and other concerns. Although her attorney has removed the case to New York, apparently it is not convenient for her to participate in litigation in New York.

Plaintiff therefore believes proceedings in the matter pending before this Court will be unduly protracted and inefficient

Accordingly, permission is requested to present the motion to transfer venue.

Very truly yours,

McELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

/s/ *John P. Beyel*  
John P. Beyel

Cc: Thomas A. Farinella, Esq.  
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